

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER GRANTING NON-PARTY THE WALT DISNEY COMPANY’S  
MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), non-party The Walt Disney Company (“TWDC”) filed a Motion to Seal (“Motion”), which seeks to seal portions of the deposition testimony of Jeremy Helfand and of certain documents identified in Plaintiffs’ and Defendant’s trial exhibit lists, and one document from Defendant’s trial exhibit list in its entirety. Having considered the Motion and accompanying memorandum of law, as well as any opposition thereto, this Court finds that (i) sufficient notice of the Motion was given; (ii) TWDC’s interest in protecting its sensitive, confidential, business information outweighs the public’s right of access; (iii) a procedure other than sealing is insufficient to protect TWDC’s interest; and (iv) TWDC seeks to seal only as much as is necessary to protect its interest.

Accordingly, it is hereby

**ORDERED** that the Motion is GRANTED; and it is further

**ORDERED** that the portions of the deposition testimony of Jeremy Helfand specified in the memorandum of law accompanying the Motion shall remain UNDER SEAL until further order of this Court; and it is further

**ORDERED** that the portions of documents from Plaintiffs' and Defendant's trial exhibit lists, and one document from Defendant's trial exhibit list in its entirety, specified in the memorandum of law accompanying the Motion shall remain UNDER SEAL until further order of this Court.

**SO ORDERED** on this \_\_ day of \_\_\_\_\_, 2024.

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United States District Judge